

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

NATIONAL BROKERS OF AMERICA, INC.,

Debtor.

Chapter 7

Bankruptcy No. 19-15488-PMM

**THIRD INTERIM AND FINAL APPLICATION OF FLASTER/GREENBERG P.C. FOR
COMPENSATION FOR LEGAL SERVICES RENDERED AS COUNSEL FOR THE
TRUSTEE AND FOR REIMBURSEMENT OF EXPENSES FOR THE PERIOD
OCTOBER 1, 2023 THROUGH JANUARY 6, 2025**

Flaster/Greenberg P.C. (“FG”), Counsel for the Trustee, in accordance with F.R.B.P. 2016, applies under Section 330 of the Bankruptcy Code for an award of compensation and reimbursement of actual, necessary expenses and represents:

Part A -- Preliminary Statement

1. Applicant is counsel for Robert H. Holber, Chapter 7 Trustee (the “Trustee”).
2. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the Trustee.
3. The services described in this Application are actual, necessary services and the compensation requested for those services is reasonable.
4. The expenses described in this Application are actual, necessary expenses.
5. Applicant believes that the sums sought by this Application are fair and reasonable in light of the time and effort devoted, the responsibilities undertaken, the results achieved, the quality and efficiency of the work done and other relevant factors.
6. Pursuant to Local Rule 2016-2(b), below is a history of this case:

The Debtor is a former broker of certain health insurance products to consumers. Since the beginning of the case, the Trustee has received residual commissions on a monthly basis from

various sources. The Trustee also engaged special counsel to pursue various Chapter 5 claims against the former owner of the Debtor. This case was settled and approved by the Court. Settlement payments by installment are being made. FG acted as general bankruptcy counsel to the Trustee at all times and assisted with the administration of these assets and successfully objected to a secured proof of claim filed in the case. Given the amount in the bank, the Trustee can easily pay this Fee Application and still have funds left to pay creditors.

7. The Trustee has reviewed this Fee Application and believes that the fees are reasonable and that the services performed were necessary for the administration of the case for the benefit of the Debtor's creditors.

8. This Fee Application is considered on an interim basis with *de novo* final review after submission of the TFR.

Part B -- General Information

**1. Third Interim Fee Application
October 1, 2023 through January 6, 2025**

Requested

| | |
|----------|-----------------|
| Fees | \$4,772.00 |
| Expenses | <u>\$199.00</u> |
| Total | \$4,971.00 |

2. General Information

a. Date case filed: September 3, 2019. Thereafter, the Office of the United States Trustee appointed Robert H. Holber as the Chapter 7 Trustee of the Debtor's estate.

b. Date application to approve employment filed: November 13, 2019.

c. Date employment approved: December 26, 2019.

d. First date services rendered in the case: October 26, 2019.

e. Compensation request is under Section 330 of the Bankruptcy Code.

f. Any fees awarded will be paid from the estate.

g. This application is for a period less than 120 days after the filing of the case or

less than 120 days after the end of the period of the last application.

 Yes X No

h. The Trustee has reviewed and approved this fee application prior to filing.

3. Prior Applications

First Interim Fee Application filed November 11, 2021 [Docket No. 141] and approved by this Court on December 1, 2021 [Docket No. 148].

Second Interim Fee Application filed October 25, 2023 [Docket No. 166] and approved by this Court on November 14, 2023 [Docket No. 174].

**4. Attorney Billing for Chapter 7 Period
October 1, 2023 through January 6, 2025**

| Name | Hourly Billing Rate | Total Billed Hours | Total Compensation |
|---------------------------|---------------------|--------------------|--------------------|
| William J. Burnett (2024) | \$655.00 | 4.40 | \$2,882 |
| Total Fees | | | \$2,882.00 |

**5. Paralegal Billing for Chapter 7 Period
October 1, 2023 through January 6, 2025**

| Name | Hourly Billing Rate | Total Billed Hours | Total Compensation |
|--------------------------|---------------------|--------------------|--------------------|
| Jennifer Vagnozzi (2023) | \$225.00 | 3.70 | \$832.50 |
| Jennifer Vagnozzi (2024) | \$235.00 | 4.50 | \$1,057.50 |
| Total Fees | | | \$1,890.00 |
| Grand Total | | | \$4,772.00 |

6. Billing Rates:

a. Are any of the billing rates different from the billing rates set forth in your last application? Yes.

b. If yes, indicate whose billing rates are different and explain why? Flaster/Greenberg's billing rates are adjusted yearly.

Part C – Billing Summary

1. Description of Services/ Detail of Hours Expended

The legal services rendered by Applicant are set forth and detailed in the attached schedules appended hereto as Exhibit "A". The total time for all attorneys and paralegals involved was in the

aggregate 12.60 hours. The total amount requested is \$4,772.00 for the period October 1, 2023 through January 6, 2025.

Part D - Expense Summary

The expenses incurred d by Applicant are set forth and detailed in the attached schedules appended hereto as Exhibit “B”. The total amount requested is \$199.00 for the period October 1, 2023 through January 6, 2025.

As required by the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330 (b)(1)(v), the Trustee has reviewed this application and has approved the requested amount. Additionally, pursuant to 11 U.S.C. § 330 (b)(2)(i), the Trustee believes that it is feasible to make an interim distribution to Chapter 7 professional creditors without prejudicing the rights of any creditor holding a claim of equal or higher priority.

WHEREFORE, Flaster/Greenberg, P.C., respectfully requests that this Court enter an Order, in the form attached: (i) granting a total interim award of \$4,772.00 in compensation and \$199.00 for fees for the period October 1, 2023 through January 6, 2025; (ii) allowing all prior interim allowances of compensation and reimbursement of expenses be made final and (iii) granting such other relief as this Court deems just and proper.

FLASTER/GREENBERG P.C.

Dated: February 27, 2025

/s/ William J. Burnett
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